

1 PHILLIP A. TALBERT
United States Attorney
2 MATHEW W. PILE
Associate General Counsel
3 Office of Program Litigation, Office 7
Oscar Gonzalez de Llano
4 Special Assistant United States Attorney
Social Security Administration
5 Office of General Counsel
6401 Security Boulevard
6 Baltimore, MD 21235
Telephone: (510) 970-4818
7 Email: Oscar.Gonzalez@ssa.gov
Attorneys for Defendant
8
9
10
11

12 UNITED STATES DISTRICT COURT
13 EASTERN DISTRICT OF CALIFORNIA

14 JACOB ALAN HEER,

15 Plaintiff,

16 v.

17 MARTIN O'MALLEY,
18 Commissioner of Social Security,

19 Defendant.

No. 2:24-cv-01943-AC

STIPULATED MOTION AND [PROPOSED]
ORDER FOR AN EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S MOTION FOR
SUMMARY JUDGMENT

20
21 IT IS HEREBY STIPULATED, by and between the parties through their respective
22 counsel of record, with the Court's approval, that Defendant's time for responding to Plaintiff's
23 Motion for Summary Judgment be extended thirty (30) days from November 18, 2024 to
24 December 18, 2024. This is Defendant's first request for an extension. Counsel for Plaintiff has
25 no objection to Defendant's request for an extension.

26 Good cause exists for this request. Defendant respectfully requests this additional time
27 because Counsel for Defendant has and will be unable to devote the time required to complete its
28

1 response. Counsel has multiple merit briefs currently due in district court cases within the next
2 week. Counsel for Defendant was also out of the office for a couple days this week providing
3 care for his son who was home sick. Given this situation an extension until December 18, 2024
4 will provide the opportunity for the undersigned Counsel for Defendant to prioritize completing
5 the response to Plaintiff's Motion for Summary Judgment. The undersigned Counsel apologizes
6 to the Court and Plaintiff's counsel for any inconvenience caused by this request and delay. All
7 other dates in the Court's Scheduling Order shall be extended accordingly.

8
9 Respectfully submitted,

10 PHILLIP A. TALBERT
11 United States Attorney

12 DATE: November 15, 2024

13 By: s/ Oscar Gonzalez de Llano
14 OSCAR GONZALEZ DE LLANO
15 Special Assistant United States Attorney
16 Attorneys for Defendant

17
18 Respectfully submitted,

19 Law Offices of Francesco Benavides


20
21 DATE: November 15, 2024

22 By: s/ Francesco Benavides *
23 Francesco Benavides
24 (*as authorized by email)
25 Attorney for Plaintiff
26
27
28

ORDER

Pursuant to Defendant's Motion, IT IS SO ORDERED that Defendant shall have an extension, up to and including December 18, 2024, to respond to Plaintiff's Motion for Summary Judgment.

DATED: November 18, 2024


ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE